

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) VFS US LLC; and (2) VFS LEASING )  
CO. )  
 )  
Plaintiffs, )  
 )  
v. ) Case No. CIV-17-240-W  
 )  
(1) COPELAND SERVICES INC., an )  
Oklahoma corporation; (2) COPELAND )  
HOT OIL SERVICE, L.L.C., an Oklahoma )  
limited liability company; (3) JANE D. )  
ROBISON, an individual; (4) KELLY L. )  
ROBISON, an individual; and (4) KEVIN )  
R. COPELAND, an individual, )  
 )  
Defendants. )

**PLAINTIFFS' MOTION FOR HEARING ON ASSETS  
AS TO DEFENDANTS AND OTHER RELIEF WITH BRIEF**

COMES NOW, Plaintiffs, VFS US LLC and VFS Leasing Co. (hereinafter referred to collectively as "Plaintiffs" or "Judgment Creditors") and files this Motion for Hearing on Assets as to all of the above-named Defendants (sometimes referred to as "Judgment Debtors") relating to the two (2) Judgments entered October 23, 2017 and November 21, 2017, for attorney fees and costs, which are attached hereto as Exhibits 1 and 2.

1. That the Judgments as against the above-named Defendants were rendered in the above-entitled cause on October 23, 2017 and on November 21, 2017, as set forth by the Court and attached hereto as Exhibits 1 and 2.
2. That the two (2) Judgments were rendered in favor of VFS Leasing and VFS US LLC on October 23, 2017 and on November 21, 2017 in the amount of

\$73,837.54 and \$227,596.11, respectfully, as set forth in Exhibit 1 and 2 attached hereto. The two (2) Judgments have not been fully satisfied or paid and are due and owing in the approximate amount of \$301,433.65, plus attorney fees and costs as set by the orders of the Court attached hereto as Exhibit 2.

3. Pursuant to Rules 64 and 69, FED.R.CIV.P., and 12 O.S. §842 *et seq.*, Plaintiffs are entitled to an Order of this Court requiring the Defendants as Judgment Debtors, to appear and answer concerning the two (2) Judgments of the District Court entered on October 23, 2017 and on November 21, 2017 before a Judge or Magistrate Judge of this Court, and forbidding a transfer or other disposition of any property belonging to said Judgment Debtors, not exempt by law.

4. The Court may further order the Judgment Debtors, named in Exhibit 1 and Exhibit 2 hereto to pay to the Plaintiffs as Judgment Creditors, or pay the Judgments in installments, such portions of the non-exempt income, however or wherever earned or acquired, of the said Judgment Debtors, as the Court may deem proper after due regard for any payments required to be made by the Judgment Debtors by virtue of law or prior Order of the Court, or under wage assignments outstanding. *See* 12 O.S. §850.

5. As Judgment Creditors, Plaintiffs move the Court to enter an Order requiring and directing the Defendants named in the Judgments attached hereto as Exhibit 1 and Exhibit 2 to appear before a District Judge or Magistrate Judge of this Court pursuant to Rules 64 and 69 FED.R.CIV.P. and 12 O.S. §842 at a specified time and place to answer questions propounded concerning the property, income, expenses, assets and liabilities of the Judgment Debtors named in the Judgments attached hereto as Exhibit 1

and Exhibit 2, and forbidding said Judgment Debtors from making any transfer or other disposition of any property, not exempt by law, and any interference therewith pending such hearing on assets.

6. Plaintiffs further move this Court, after the hearing prayed for herein, for an Order directing said Judgment Debtors named in the attached Judgments, to pay to the Plaintiffs for application on judgments, such portion of the non-exempt income, however or wherever earned or acquired, as the Court may deem proper after due regard for any payments required to be made by virtue of law or prior Order of the Court.

7. The relief requested in this Motion is authorized pursuant to 12 O.S. §§842, 844, 849, and 850 which are applicable in this Court pursuant to FED.R.CIV.P. 64 and 69.

Accordingly, Plaintiffs request the Court to enter an Order for the Judgment Debtors named in Exhibit 1 and Exhibit 2 to appear before this Court and answer as to his or her assets and to enter an injunction forbidding transferring, alienating and/or concealing or encumbering any non-exempt property and for relief under 12 O.S. §844, if necessary, and for such other relief of which Judgment Creditors, may be entitled. An Order is submitted with this Motion.

Respectfully Submitted,

/s/ John B. Heatly

John B. Heatly (OBA #4037)

Fellers, Snider, Blankenship,

Bailey & Tippens, P.C.

100 North Broadway, Suite 1700

Oklahoma City, Oklahoma 73102

Telephone: (405) 232-0621

Facsimile: (405) 232-9659

Email: jheatly@fellerssnider.com

**ATTORNEYS FOR PLAINTIFFS,  
VFS US LLC AND VFS LEASING CO.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26 day of March, 2020, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Daniel P. Stake, Esq.  
stakelawoffice@gmail.com  
Attorney for Defendants

Copeland Hot Oil Service, L.L.C.  
c/o Registered Agent, Kevin R. Copeland  
607 S. Dunlap  
Hennessey, OK 73742

Copeland Services Inc.  
c/o Registered Agent, Jane D. Robison  
526 N. Cimarron Street  
Hennessey, OK 73742

Jane D. Robison  
800 N. Mitchell Road  
Hennessey, OK 73742

Kelly L. Robison  
800 N. Mitchell Road  
Hennessey, OK 73742

Kevin R. Copeland  
526 N. Oak  
Hennessey, OK 73742

*/s/ John B. Heatly* \_\_\_\_\_  
John B. Heatly

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